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Governmental Entities Group*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**ELEVENTH MONTHLY FEE STATEMENT OF
CAPLIN & DRYSDALE, CHARTERED, FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES WITH
RESPECT TO SERVICES RENDERED AS COUNSEL TO THE
MULTI-STATE GOVERNMENTAL ENTITIES GROUP FOR THE PERIOD
COMMENCING JULY 1, 2020, THROUGH JULY 31, 2020**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters are located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Name of Applicant: Caplin & Drysdale, Chartered

Authorized to Provide Professional Services to: Multi-State Governmental Entities Group

Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant: April 22, 2021 [Docket No. 2695]

Period for which Compensation and Reimbursement are sought: July 1, 2020, through July 31, 2020

Amount of Compensation sought as actual, reasonable, and necessary: \$171,164.50

Amount of Expense Reimbursement sought as actual, reasonable, and necessary: \$3,766.44

Total compensation requested in this statement: \$136,931.60 (80% of \$171,164.50)

Total expenses requested in this statement: \$3,766.44

Total compensation and expenses requested in this statement: \$140,698.04

This is a: X monthly interim final application.

Pursuant to the *Order Authorizing the Debtors to Enter Into Term Sheet With and Pay Certain Fees and Expenses of the Multi-State Governmental Entities Group* [Docket No. 2695] (the “**MSGE Group Fee Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 529] (the “**Interim Compensation Order**”), the law firm of Caplin & Drysdale, Chartered (“**Caplin & Drysdale**”), hereby submits this Eleventh Monthly Fee Statement (the “**Fee Statement**”) for allowance of compensation for professional legal services rendered as counsel to the Multi-State Governmental Entities Group (“**MSGE Group**”) in the above-captioned case, and reimbursement of actual and necessary expenses incurred, for the period commencing July 1, 2020, through July 31, 2020 (the “**Fee Period**”).

Itemization of Services Rendered and Disbursements Incurred

Attached hereto as **Exhibit A**, is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Fee Period with respect to each of the project categories Caplin & Drysdale established in accordance with its internal billing procedures. As reflected in **Exhibit A**, Caplin & Drysdale rendered 278.9 hours of professional services during the Fee Period, resulting in fees totaling \$171,164.50. Pursuant to this Fee Statement, Caplin & Drysdale seeks reimbursement for 80% of such fees, totaling \$136,931.60.

Attached hereto as **Exhibit B** is a chart of Caplin & Drysdale's professionals and paraprofessionals who rendered services to the MSGE Group in connection with these chapter 11 cases during the Fee Period. This chart includes the title and standard hourly rate for each attorney and paraprofessional, as well as the aggregate hours worked and the amount of fees earned by each professional. The blended hourly billing rate of attorneys for all services provided during the Fee Period is \$629.81. The blended hourly rate of all paraprofessionals is \$324.39. A copy of the computer-generated time entries reflecting all time recorded, organized in project billing categories by Caplin & Drysdale is attached hereto as **Exhibit D**.

Attached hereto as **Exhibit C** is a chart of necessary and out-of-pocket expenses incurred by Caplin & Drysdale in the amount of \$3,766.44 in connection with providing professional services during the Fee Period and a copy of the computer-generated list of expenses.

Notice

Caplin & Drysdale will provide notice of the Fee Statement in accordance with the Interim Compensation Order.

Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Fee Statement, serve via email, to the Notice Parties (as defined in the Interim Compensation Order), a written notice setting forth the precise nature of the objection and the amount at issue.

If an objection is timely served pursuant to the Interim Compensation Order, the Debtors shall be authorized and directed to pay Caplin & Drysdale an amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue; it shall not be sufficient to simply object to all fees and expenses.

Dated: July 12, 2021

Respectfully submitted,

/s/ Kevin C. Maclay

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Counsel for the Multi-State

Governmental Entities Group

EXHIBIT A

SUMMARY OF SERVICES BY CATEGORY

JULY 1, 2020, THROUGH JULY 31, 2020

Task Code	Project Category	Total Hours	Total Fees
.04	Case Administration	3.0	\$1,020.00
.11	Plan & Disclosure Statement	234.4	\$144,305.00
.15	Committee Meetings/Conferences	36.4	\$24,335.00
.17	Docket Review & File Maintenance	5.1	\$1,504.50
TOTAL		278.9	\$171,164.50

EXHIBIT B

SUMMARY OF HOURS AND FEES BY PROFESSIONAL

JULY 1, 2020, THROUGH JULY 31, 2020

Name of Professional	Position/Year Admitted/Department	Hourly Billing Rate	Total Hours Billed	Total Compensation
Kevin C. Maclay	Member / 1994 / Bankruptcy	\$845.00	69.4	\$58,643.00
Jeffrey A. Liesemer	Member / 1993 / Bankruptcy	\$795.00	44.0	\$34,980.00
Ann W. Langley	Of Counsel / 2009 / Bankruptcy	\$620.00	72.6	\$45,012.00
George M. O'Connor	Associate / 2018 / Bankruptcy	\$355.00	78.2	\$27,761.00
Cecilia Guerrero	Paralegal / N/A / Bankruptcy	\$340.00	9.6	\$3,264.00
Brigette A. Wolverton	Paralegal / N/A / Bankruptcy	\$295.00	5.1	\$1,504.50
TOTAL			278.9	\$171,164.50

EXHIBIT C

SUMMARY OF EXPENSES

JULY 1, 2020, THROUGH JULY 31, 2020

Category	Amount
Conference Call Service	\$215.96
Database Research	\$2,872.88
Miscellaneous	\$200.00
PACER Service	\$477.60
TOTAL	\$3,766.44

EXHIBIT D



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Multi-State Governmental Entities Group

Invoice #: 335280

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RE: Purdue Pharma Bankruptcy Proceeding

For Professional Services Rendered Through July 31, 2020

Total Services	\$171,164.50
Total Disbursements	\$3,766.44
Total Current Charges	\$174,930.94

Remittance Advice

[Payment is due upon receipt. If you should have any questions, please email accounting@capdale.com.](mailto:accounting@capdale.com)

Check Payable To:

Caplin & Drysdale, Chartered
Attn: Accounts Receivable
One Thomas Circle NW, Suite 1100
Washington, DC 20005

Wire Transfer:

Receiving Bank: Bank of America
ABA Wire Routing Number: 026009593
ABA ACH Routing Number: 054001204
Swift Code: BOFAUS3N
Beneficiary: Caplin & Drysdale, Chartered
Account Number: 001920814809

Credit Card:

We accept American Express. A service fee of 2.4% for Corporate Cards and 2.95% for Individual Cards will be added to all payments.

Please return this remittance page with your payment. Thank you.



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Multi-State Governmental Entities Group

July 31, 2020

Invoice #: 335280

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RE: Purdue Pharma Bankruptcy Proceeding

For Professional Services Rendered Through July 31, 2020

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.04 Case Administration & Calendar Control					
7/9/2020	CG	Review recent filings and update docketing calendar re same.	0.7	\$340.00	\$238.00
7/16/2020	CG	Review recent filings and judge's calendar and update docketing calendar re same.	0.4	\$340.00	\$136.00
7/18/2020	CG	Review docket, recent filings, judge's calendar (.5); KCM, JAL registrations for telephonic appearance re same (.2); update docketing calendar re same (.2).	0.9	\$340.00	\$306.00
7/18/2020	CG	GMO CourtSolutions registration and communications re same.	0.1	\$340.00	\$34.00
7/26/2020	CG	Review docket and judge's calendar and update docketing calendar re same (.2); exchange emails w/ AWL re same (.1).	0.3	\$340.00	\$102.00
7/28/2020	CG	Draft pro hac vice application and proposed order (.3); communication w/ AWL (.1); file and serve same (.2).	0.6	\$340.00	\$204.00
Total			3.00		\$1,020.00
.11 Plan & Disclosure Statement					
7/1/2020	KCM	Review/analyze proofs of claim materials.	0.2	\$845.00	\$169.00
7/1/2020	KCM	Teleconferences w/ GMO re mediation status and tasks.	0.8	\$845.00	\$676.00
7/1/2020	GMO	Calls w/ KCM re mediation.	0.8	\$355.00	\$284.00
7/2/2020	KCM	Attend mediation pre-call w/ AHC, NCSG, GMO, and clients.	0.9	\$845.00	\$760.50
7/2/2020	KCM	Attend mediation session w/ private groups, AHC, NCSG and clients.	2.1	\$845.00	\$1,774.50

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
7/2/2020	GMO	Prepare for mediation session (0.6); attend call w/ AHC, NCSG and KCM re upcoming mediation session (0.9); prepare for UCC call (0.2); attend call w/ UCC (0.4).	2.1	\$355.00	\$745.50
7/3/2020	KCM	Teleconference w/ GMO re mediation issues.	0.6	\$845.00	\$507.00
7/3/2020	GMO	Prepare for call re class claim motions (0.4); attend call w/ AHC, NCSG, and Debtors re class claim motions (0.7); call w/ KCM re research re constituent inquiry (0.7); call w/ KCM re mediation (0.6).	2.4	\$355.00	\$852.00
7/5/2020	KCM	Calls w/ GMO re mediation issues.	0.3	\$845.00	\$253.50
7/5/2020	GMO	Calls w/ KCM re mediation and case strategy.	0.3	\$355.00	\$106.50
7/6/2020	KCM	Attend mediation call w/ AHC, NCSG, private groups, UCC, clients and mediators (1.4); call w/ GMO re AHC financial presentation (0.1).	1.5	\$845.00	\$1,267.50
7/6/2020	KCM	Call w/ Debtors, AHC, NCSG and GMO re class claims motions.	0.7	\$845.00	\$591.50
7/6/2020	GMO	Call w/ KCM re AHC financial presentation (0.1); call w/ KCM, Debtors, AHC and NCSG re class claims motions (0.7); draft memo re claims issues (1.2).	2.0	\$355.00	\$710.00
7/7/2020	JAL	Telephone call w/ KCM re communication from Ad Hoc Committee counsel (.1); review and analyze materials and correspondence re proof of claim filings and related materials (4.8); call w/ KCM re communication from Ad Hoc Committee counsel and terms of bar date order (.2); draft and revise memo re issues relating to communication from Ad Hoc Committee counsel and bar-date order (1.7).	6.8	\$795.00	\$5,406.00
7/7/2020	KCM	Plan/prepare for and attend call re mediation issues (1.1); call w/ JAL re communication from Ad Hoc Committee counsel (.1); call w/ JAL re communication from Ad Hoc Committee counsel and terms of bar date order (.2).	1.4	\$845.00	\$1,183.00
7/8/2020	JAL	Draft and revise memo to KCM re proof of claim and bar-date order issues.	2.7	\$795.00	\$2,146.50
7/8/2020	KCM	Attend mediation session.	1.4	\$845.00	\$1,183.00
7/8/2020	KCM	Review materials re Molton letter and communicate w/ JAL re same.	0.9	\$845.00	\$760.50
7/9/2020	JAL	Telephone call w/ KCM re draft letters to AHC counsel re proofs of claim issues.	0.1	\$795.00	\$79.50
7/9/2020	KCM	Plan/prepare for and attend mediation meeting (1.9); call w/ JAL re draft letters to AHC counsel (.1).	2.0	\$845.00	\$1,690.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
7/9/2020	GMO	Research re mediation (.9); draft memo re proofs of claim (2.2); calls w/ Prime Clerk re proofs of claim (0.3); communications w/ Debtors re proofs of claim (0.2).	3.6	\$355.00	\$1,278.00
7/10/2020	JAL	Review and edit letter to AHC counsel re proofs of claim (1.3); telephone call w/ KCM re draft letter to AHC counsel (0.1); teleconference w/ counsel for Debtors and certain creditor groups re motions to file class proofs of claims (0.5); analyze issues relating to motions to file class proofs of claims (0.2); confer w/ KCM and GMO re class proof-of-claim motions (0.1); review and comment on draft letter to AHC counsel (0.2); review and analysis of class proof-of-claim motions and briefing (3.8).	6.2	\$795.00	\$4,929.00
7/10/2020	KCM	Call w/ Debtors, AHC and NCSG re class claims filings (.5); confer w/ JAL and GMO re class claim motions (0.1).	0.6	\$845.00	\$507.00
7/10/2020	KCM	Teleconferences w/ GMO re mediation issues.	0.2	\$845.00	\$169.00
7/10/2020	KCM	Edit and finalize and send letter to D. Molton re class claims (.7); call w/ JAL re same (.1).	0.8	\$845.00	\$676.00
7/10/2020	GMO	Research re class claim motions (3.2); calls w/ KCM re mediation (0.2); confer w/ JAL and KCM re class claim motions (0.1).	3.5	\$355.00	\$1,242.50
7/11/2020	KCM	Plan/prepare for and attend mediation session w/ MSGE Group and mediator (1.0); call w/ GMO re mediation and class claim motions (0.6).	1.6	\$845.00	\$1,352.00
7/11/2020	KCM	Plan/prepare for and attend teleconference w/ A. Preis re mediation.	0.5	\$845.00	\$422.50
7/11/2020	GMO	Call w/ KCM re mediation and class claim motions.	0.6	\$355.00	\$213.00
7/13/2020	JAL	Review, analyze, and edit draft opposition to class proof of claim motions.	1.7	\$795.00	\$1,351.50
7/13/2020	KCM	Attend AHC and NCSG call re mediation.	1.5	\$845.00	\$1,267.50
7/13/2020	KCM	Communicate w/ GMO re mediation issues.	0.2	\$845.00	\$169.00
7/13/2020	GMO	Research bankruptcy issue (1.6); draft memo re same (1.2).	2.8	\$355.00	\$994.00
7/14/2020	JAL	Communications w/ KCM re opposition to class proof of claim motions.	0.1	\$795.00	\$79.50
7/14/2020	KCM	Attend mediation call re tribal issues.	0.6	\$845.00	\$507.00
7/14/2020	KCM	Teleconference w/ D. Molton and GMO re mediation.	0.2	\$845.00	\$169.00
7/14/2020	KCM	Attend mediation session w/ AHC, NCSG and MSGE.	1.7	\$845.00	\$1,436.50

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
7/14/2020	GMO	Review and analyze draft filing re class claims motion (1.4); review NCSG comments re class claims motion (0.7); communications w/ AHC (R. Ringer) re class claim motions (0.4); call w/ KCM and D. Molton re case status (0.2).	6.6	\$355.00	\$2,343.00
7/14/2020	CG	Communications w/ GMO re updated entities list re 2019 statement.	0.1	\$340.00	\$34.00
7/14/2020	CG	Review and revise entities list re 2019 statement (.2); communications w/ GMO re same (.1).	0.3	\$340.00	\$102.00
7/15/2020	JAL	Review and analyze Debtors' draft opposition to class proof-of-claim motions (0.9); review and analyze draft opposition of public claimants to class proof-of-claim motions (1.7); telephone call w/ KCM re issues relating to class proof-of-claim motions (.1); draft objections thereto (0.2).	2.9	\$795.00	\$2,305.50
7/15/2020	KCM	Teleconference w/ governmental entities and clients re mediation negotiations w/ private groups.	1.5	\$845.00	\$1,267.50
7/15/2020	KCM	Teleconference w/ JAL re class proof-of-claim motions.	0.1	\$845.00	\$84.50
7/16/2020	JAL	Review and analyze of Debtors' draft opposition to class proof-of-claim motions (2.7); telephone call w/ KCM re same (0.2); communications w/ GMO re same (0.3); review and analyze materials in connection w/ opposition papers against class proof-of-claim motions (1.1); review and analyze draft opposition of public claimants to class proof-of-claim motions (1.2).	5.5	\$795.00	\$4,372.50
7/16/2020	KCM	Teleconference re class claims and mediation issues w/ GMO (.5); teleconference w/ JAL re same (.2).	0.7	\$845.00	\$591.50
7/16/2020	KCM	Teleconference w/ AWL re mediation issues.	0.6	\$845.00	\$507.00
7/16/2020	AWL	Conference call w/ GMO re case status and strategy.	1.7	\$620.00	\$1,054.00
7/16/2020	AWL	Review and analyze term sheet.	1.8	\$620.00	\$1,116.00
7/16/2020	AWL	Teleconference w/ KCM re mediation issues.	0.6	\$620.00	\$372.00
7/16/2020	GMO	Draft memo re case status for KCM (0.2); calls w/ KCM re case status (0.5) call w/ AWL re case status and strategy (1.7).	2.4	\$355.00	\$852.00
7/17/2020	JAL	Review, analyze and provide comments re draft joinder.	0.2	\$795.00	\$159.00
7/17/2020	KCM	Teleconference w/ GMO re mediation status and tasks (.1); call w/ AWL re case strategy and upcoming hearing (.6).	0.7	\$845.00	\$591.50
7/17/2020	AWL	Review and analyze filings in preparation for upcoming mediation.	2.7	\$620.00	\$1,674.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
7/17/2020	AWL	Conference call w/ counsel for AHC and NCSG re case strategy and filings.	0.5	\$620.00	\$310.00
7/17/2020	AWL	Conference call w/ KCM re case strategy and upcoming hearing.	0.6	\$620.00	\$372.00
7/17/2020	AWL	Attend mediation sessions w/ NAS and TPP groups.	3.4	\$620.00	\$2,108.00
7/17/2020	GMO	Teleconference w/ KCM re mediation status and tasks.	0.1	\$355.00	\$35.50
7/18/2020	KCM	Call w/ AWL re exclusivity motion and term sheet.	0.4	\$845.00	\$338.00
7/18/2020	AWL	Review and analyze exclusivity motion.	0.3	\$620.00	\$186.00
7/18/2020	AWL	Confer w/ KCM re exclusivity motion and term sheet.	0.4	\$620.00	\$248.00
7/18/2020	GMO	Review draft 2019 statement (.5); communications re same w/ KCM and AWL (.1).	0.6	\$355.00	\$213.00
7/19/2020	KCM	Confer w/ AWL re case strategy and upcoming tasks.	0.4	\$845.00	\$338.00
7/19/2020	AWL	Confer w/ GMO re case status and 2019 statement.	0.2	\$620.00	\$124.00
7/19/2020	AWL	Confer w/ KCM re case strategy and upcoming tasks.	0.4	\$620.00	\$248.00
7/19/2020	GMO	Call w/ AWL re case status and 2019 statement.	0.2	\$355.00	\$71.00
7/20/2020	JAL	Review and analyze replies in support of class proof-of-claim motions.	1.9	\$795.00	\$1,510.50
7/20/2020	AWL	Prepare for mediation sessions and review correspondence re same.	0.7	\$620.00	\$434.00
7/20/2020	AWL	Attend mediation sessions w/ private entities.	7.8	\$620.00	\$4,836.00
7/20/2020	AWL	Calls w/ GMO re mediation strategy.	0.5	\$620.00	\$310.00
7/20/2020	GMO	Communications w/ Prime Clerk re proofs of claim (0.3); draft amended 2019 statement (0.2); calls w/ AWL re mediation (.5); complete draft cover filing for amended 2019 (0.6); revise entities list for amended 2019 (0.6).	2.2	\$355.00	\$781.00
7/20/2020	CG	Review, revise, and finalize amended 2019 statement (.5); communication w/ AWL and GMO re same (.1).	0.6	\$340.00	\$204.00
7/21/2020	JAL	Review and analyze of reply briefs in support of class proof-of-claim motions.	1.7	\$795.00	\$1,351.50
7/21/2020	KCM	Confer w/ AWL re case strategy and upcoming hearing.	0.9	\$845.00	\$760.50
7/21/2020	AWL	Review and analyze recent filings and correspondence re same.	0.8	\$620.00	\$496.00
7/21/2020	AWL	Review and analyze documents for upcoming mediation presentation.	1.9	\$620.00	\$1,178.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
7/21/2020	AWL	Attend conference call w/ public entities re mediation strategy.	1.0	\$620.00	\$620.00
7/21/2020	AWL	Confer w/ KCM re case strategy and upcoming hearing.	0.9	\$620.00	\$558.00
7/21/2020	GMO	Call w/ CG re entities list re 2019 statement.	0.1	\$355.00	\$35.50
7/21/2020	GMO	Emails w/ Debtors re proofs of claim (0.3); review and analyze UCC correspondence (0.3); research re mediation issues (0.6); prepare for hearing (0.6); review and analyze responsive filings to MSGE joint motion re class claims (0.8).	2.6	\$355.00	\$923.00
7/21/2020	CG	Review and revise entities list and related materials (1.1); email GMO, AWL, KCM re same (.1); call w/ GMO re same (.1).	1.3	\$340.00	\$442.00
7/22/2020	JAL	Review and provide comments re draft objections to class proof-of-claim motion (1.5); review and analyze reply briefs in support of class proof-of-claim motions (2.1); teleconference w/ Debtors' and public claimants' counsel re upcoming hearing on class proof-of-claim motions (0.4); telephone call w/ AWL re hearing on class proof-of-claim motions and related issues (0.4); correspondence w/ AWL and GMO re issue related to class proof-of-claim motion (2.2); review and analyze materials in preparation for hearing on class proof-of-claim motions (1.7); telephone call w/ KCM re tomorrow's hearing on class proof-of-claim motions and related issues (0.3).	8.6	\$795.00	\$6,837.00
7/22/2020	KCM	Call w/ JAL re proof of claim issues (.3); teleconference w/ AWL and GMO re hearing (.9).	1.2	\$845.00	\$1,014.00
7/22/2020	KCM	Plan/prepare for hearing.	1.4	\$845.00	\$1,183.00
7/22/2020	AWL	Review and analyze materials re upcoming hearing.	0.9	\$620.00	\$558.00
7/22/2020	AWL	Attend mediation update session w/ DOJ.	1.7	\$620.00	\$1,054.00
7/22/2020	AWL	Confer w/ JAL re upcoming class claims hearing (.4); conference call w/ GMO, counsel to Debtors, AHC, and NCSG re upcoming hearing on class claims motion (.5); call w/ GMO re mediation and hearing (.4); call w/ KCM and GMO re preparation for class claims hearing (.9); confer w/ GMO re outstanding case tasks (.5).	2.7	\$620.00	\$1,674.00
7/22/2020	GMO	Review and analyze draft joint filing re class claims (0.4); call w/ Debtors, AHC/NCSG and AWL re hearing (0.5); call w/ AWL re case status (0.4); call w/ KCM and AWL re case status (0.9); draft oral argument outline for hearing (3.0); confer w/ AWL re outstanding case tasks (.5).	5.7	\$355.00	\$2,023.50

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
7/22/2020	CG	Exchange emails w/ JAL re hearing information and attending same.	0.3	\$340.00	\$102.00
7/22/2020	CG	Review and revise entities list (.9); exchange emails w/ AWL, GMO re same (.2).	1.1	\$340.00	\$374.00
7/23/2020	JAL	Review and analyze reply briefs in support of class proof-of-claim motions (1.3); review and analyze materials in preparation for hearing on class proof-of-claim motions (0.7); attend hearing on class proof-of-claim motions and other matters (3.2).	5.2	\$795.00	\$4,134.00
7/23/2020	KCM	Plan/prepare for hearing.	2.1	\$845.00	\$1,774.50
7/23/2020	KCM	Teleconference w/ AHC, NCSG, AWL and GMO re hearing.	0.3	\$845.00	\$253.50
7/23/2020	KCM	Teleconference w/ AWL and GMO re hearing (.2); confer w/ AWL and GMO re 2019 statement (.1).	0.3	\$845.00	\$253.50
7/23/2020	KCM	Attend hearing.	3.2	\$845.00	\$2,704.00
7/23/2020	AWL	Conference w/ KCM, GMO, counsel to Debtors, AHC and NCSG re hearing agenda.	0.3	\$620.00	\$186.00
7/23/2020	AWL	Review and analyze materials for upcoming hearing on class claims motions.	1.4	\$620.00	\$868.00
7/23/2020	AWL	Attending hearing on exclusivity and class claims motions.	3.2	\$620.00	\$1,984.00
7/23/2020	AWL	Confer w/ GMO re hearing preparation.	0.7	\$620.00	\$434.00
7/23/2020	AWL	Call w/ KCM and GMO re hearing.	0.2	\$620.00	\$124.00
7/23/2020	AWL	Confer w/ KCM and GMO re 2019 statement.	0.1	\$620.00	\$62.00
7/23/2020	AWL	Prepare for mediation and review and analyze related materials.	1.8	\$620.00	\$1,116.00
7/23/2020	GMO	Draft memo re case status and next steps (3.8); call w/ KCM, AWL, and AHC/NCSG/Debtors re hearing (0.3); call w/ KCM and AWL re hearing (0.2); calls w/ AWL re hearing and mediation (.7); revise documents and outline for hearing (1.8); confer w/ KCM and AWL re 2019 statement (.1).	6.9	\$355.00	\$2,449.50
7/24/2020	KCM	Teleconferences w/ GMO re mediation and case status.	0.2	\$845.00	\$169.00
7/24/2020	KCM	Attend mediation w/ public entities, mediator, TPPs and clients.	1.4	\$845.00	\$1,183.00
7/24/2020	KCM	Teleconference w/ AWL re case status and tasks.	0.2	\$845.00	\$169.00
7/24/2020	AWL	Attend presentation to UCC re public slide decks.	1.1	\$620.00	\$682.00
7/24/2020	AWL	Call w/ GMO re 2019 statement and mediation issues (.6); attend meeting w/ GMO and AHC/NCSG/UCC (0.2).	0.4	\$620.00	\$248.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
7/24/2020	AWL	Confer w/ KCM re outstanding case tasks.	0.2	\$620.00	\$124.00
7/24/2020	AWL	Review and analyze materials for upcoming MSGE mediation session.	2.4	\$620.00	\$1,488.00
7/24/2020	AWL	Attend mediation session w/ TPPs.	1.4	\$620.00	\$868.00
7/24/2020	AWL	Review and analyze correspondence re 2019 statement.	0.3	\$620.00	\$186.00
7/24/2020	GMO	Analyze and revise exhibits for amended 2019 filing (1.7); attend meeting w/ AWL and AHC/NCSG/UCC (0.2); prepare for UCC call (0.2); calls w/ AWL re mediation issue (0.6); research re mediation issue (1.6); teleconferences w/ KCM re case status (.2).	4.5	\$355.00	\$1,597.50
7/24/2020	CG	Communications w/ GMO and AWL re entities list.	0.1	\$340.00	\$34.00
7/25/2020	AWL	Review of mediation presentation.	0.3	\$620.00	\$186.00
7/26/2020	KCM	Review/edit mediation presentation.	0.7	\$845.00	\$591.50
7/26/2020	KCM	Teleconference w/ AWL re mediation presentation.	0.2	\$845.00	\$169.00
7/26/2020	AWL	Review, analyze and edit mediation presentation.	3.1	\$620.00	\$1,922.00
7/26/2020	AWL	Teleconference w/ KCM re mediation presentation.	0.2	\$620.00	\$124.00
7/26/2020	GMO	Review, analyze and revise mediation materials.	2.1	\$355.00	\$745.50
7/27/2020	JAL	Review, analyze and edit draft rule 2019 statement.	0.4	\$795.00	\$318.00
7/27/2020	KCM	Teleconferences w/ GMO re 2019 filing and case status (.2); confer w/ AWL re case tasks and research issues (.6).	0.8	\$845.00	\$676.00
7/27/2020	KCM	Prepare for mediation session.	0.9	\$845.00	\$760.50
7/27/2020	KCM	Attend mediation session (1.7); follow-up re same w/ AWL and GMO (.7).	2.4	\$845.00	\$2,028.00
7/27/2020	AWL	Review and revise mediation presentation.	0.9	\$620.00	\$558.00
7/27/2020	AWL	Attend MSGE mediation session (1.7); follow-up re same w/ KCM and GMO (.7).	2.4	\$620.00	\$1,488.00
7/27/2020	AWL	Review 2019 statement for filing.	0.2	\$620.00	\$124.00
7/27/2020	AWL	Confer w/ KCM re outstanding tasks and research issues.	0.6	\$620.00	\$372.00
7/27/2020	GMO	Attend MSGE mediator session (1.7) and follow-up call w/ KCM and AWL (.7); calls w/ KCM re 2019 statement and mediation (0.2); revise and finalize amended 2019 statement (2.6).	5.2	\$355.00	\$1,846.00
7/27/2020	CG	Review and revise entities list (1.4); communications w/ AWL, GMO re same (.5); finalize and file amended 2019 statement (.3).	2.2	\$340.00	\$748.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
7/28/2020	KCM	Teleconference w/ E. Vonnegut re mediation.	0.5	\$845.00	\$422.50
7/28/2020	KCM	Teleconference w/ A. Preis re mediation.	0.2	\$845.00	\$169.00
7/28/2020	AWL	Communications w/ KCM re outstanding case tasks.	0.4	\$620.00	\$248.00
7/28/2020	AWL	Review and analyze materials regarding proofs of claim.	0.6	\$620.00	\$372.00
7/28/2020	AWL	Confer w/ GMO re proofs of claim and upcoming deadlines.	0.3	\$620.00	\$186.00
7/28/2020	AWL	Review revised PowerPoint presentation to mediators.	0.3	\$620.00	\$186.00
7/28/2020	GMO	Research re proofs of claim (2.1); confer w/ AWL re same (.3).	2.4	\$355.00	\$852.00
7/29/2020	KCM	Teleconference w/ AWL and Gilbert re mediation issues.	0.6	\$845.00	\$507.00
7/29/2020	KCM	Teleconferences w/ AWL re mediation issues.	0.7	\$845.00	\$591.50
7/29/2020	KCM	Teleconference w/ GMO re proof of claim issues.	0.1	\$845.00	\$84.50
7/29/2020	KCM	Review/analyze mediation presentation.	0.9	\$845.00	\$760.50
7/29/2020	AWL	Review and analyze materials in preparation for mediation session (.4); confer w/ KCM re mediation presentation and related strategy (.7).	1.1	\$620.00	\$682.00
7/29/2020	AWL	Attend insurance presentation w/ AHC representatives (1.9); attend call w/ KCM and S. Gilbert re upcoming mediation session (.6); review and edit presentation for mediation sessions (1.2).	3.7	\$620.00	\$2,294.00
7/29/2020	GMO	Calls w/ KCM re case status (0.1); research re mediation issue (3.9).	4.0	\$355.00	\$1,420.00
7/30/2020	KCM	Attend mediation session w/ clients and mediators.	1.0	\$845.00	\$845.00
7/30/2020	KCM	Teleconference w/ K. Feinberg re mediation.	0.5	\$845.00	\$422.50
7/30/2020	AWL	Prepare for mediation and review and analyze related material re same.	0.5	\$620.00	\$310.00
7/30/2020	AWL	Attend mediation session w/ MSGE group.	1.0	\$620.00	\$620.00
7/30/2020	GMO	Prepare for UCC call (0.2); attend call w/ UCC (0.5); communications w/ KCM and AWL re same (0.2); review and analyze NAACP draft motion (0.2).	1.1	\$355.00	\$390.50
7/31/2020	KCM	Attend MSGE mediation w/ AHC and NCSG.	2.2	\$845.00	\$1,859.00
7/31/2020	KCM	Teleconference w/ D. Barrett and MSGE re mediation issues.	0.3	\$845.00	\$253.50
7/31/2020	KCM	Teleconference w/ AWL and GMO re mediation tasks and case status.	0.7	\$845.00	\$591.50
7/31/2020	KCM	Teleconference w/ F. Blaudeau re NAACP mediation issues.	0.4	\$845.00	\$338.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
7/31/2020	KCM	Teleconference w/ K. Feinberg re mediation.	0.1	\$845.00	\$84.50
7/31/2020	AWL	Review and revise mediation presentation.	1.7	\$620.00	\$1,054.00
7/31/2020	AWL	Conference call w/ KCM and GMO re NAACP intervention and mediation.	0.7	\$620.00	\$434.00
7/31/2020	AWL	Review and analyze NAACP motion to intervene.	0.4	\$620.00	\$248.00
7/31/2020	AWL	Attend mediation session w/ AHC and NCSG groups.	2.1	\$620.00	\$1,302.00
7/31/2020	AWL	Attend mediation call w/ hospitals and GMO.	0.7	\$620.00	\$434.00
7/31/2020	AWL	Confer w/ GMO re research issues.	0.1	\$620.00	\$62.00
7/31/2020	GMO	Call w/ KCM and AWL re mediation (0.7); meet w/ mediation parties, AWL (0.7); calls w/ Debtors re claims (0.5); research re bankruptcy issue (1.7); call w/ AWL re same (.1).	3.7	\$355.00	\$1,313.50
7/31/2020	CG	Review communications re revisions to entities list.	0.1	\$340.00	\$34.00
Total			234.40		\$144,305.00
.15 Committee Meetings/Conferences					
7/1/2020	KCM	Attend MSGE Group call re plan issues.	0.6	\$845.00	\$507.00
7/2/2020	KCM	Teleconference w/ B. Scatton re plan issue.	0.1	\$845.00	\$84.50
7/3/2020	KCM	Teleconferences w/ B. Kaswan and GMO re proof of claim and bankruptcy issues.	0.7	\$845.00	\$591.50
7/3/2020	GMO	Teleconferences w/ B. Kaswan and KCM re proof of claim and bankruptcy issues.	0.7	\$355.00	\$248.50
7/8/2020	KCM	Attend MSGE negotiation subcommittee meeting re mediation.	1.0	\$845.00	\$845.00
7/8/2020	KCM	Attend MSGE Group meeting re mediation.	0.6	\$845.00	\$507.00
7/8/2020	GMO	Draft MSGE Group correspondence re proofs of claim.	3.2	\$355.00	\$1,136.00
7/9/2020	GMO	Communications w/ MSGE subgroup re mediation issues (0.8); revise and finalize MSGE letter (.4); communications w/ MSGE members re proofs of claim (0.4).	1.6	\$355.00	\$568.00
7/10/2020	CG	Review, revise, and finalize letter re proofs of claim/constituent inquiry (.3); communicate w/ GMO re same (.2).	0.5	\$340.00	\$170.00
7/11/2020	KCM	Plan/prepare for and attend mediation pre-call w/ MSGE Group.	0.9	\$845.00	\$760.50
7/12/2020	KCM	Communicate w/ clients re mediation and class proofs of claim issues.	0.3	\$845.00	\$253.50
7/13/2020	KCM	Attend MSGE negotiating subcommittee call re mediation.	1.0	\$845.00	\$845.00
7/13/2020	KCM	Review/analyze class proofs of claim filing and communicate w/ clients re same.	0.9	\$845.00	\$760.50

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.15 Committee Meetings/Conferences					
7/14/2020	KCM	Attend call w/ MSGE Group re tribal issues.	0.5	\$845.00	\$422.50
7/14/2020	KCM	Attend call w/ MSGE Group re mediation issues.	0.8	\$845.00	\$676.00
7/15/2020	KCM	Attend MSGE Group call re mediation.	0.8	\$845.00	\$676.00
7/15/2020	KCM	Teleconference w/ B. Kaswan re mediation.	0.9	\$845.00	\$760.50
7/15/2020	GMO	Prepare for MSGE Group call (0.2); attend call w/ KCM and MSGE Group (0.8); email MSGE members re filing proofs of claim (0.4); call w/ MSGE member counsel (B. Scatton) re filing proofs of claims (0.1).	1.7	\$355.00	\$603.50
7/16/2020	KCM	Teleconference w/ S. Sanford re case status.	0.4	\$845.00	\$338.00
7/19/2020	AWL	Review and analyze outstanding case tasks and send communications to MSGE members re same.	1.9	\$620.00	\$1,178.00
7/22/2020	KCM	Teleconference w/ AWL, GMO and J. Scolnick re proof of claim issues.	0.4	\$845.00	\$338.00
7/22/2020	AWL	Teleconference w/ KCM, GMO and J. Scolnick re proof of claim issues.	0.4	\$620.00	\$248.00
7/23/2020	KCM	Teleconference w/ J. Tapley and AWL re mediation issues.	0.6	\$845.00	\$507.00
7/23/2020	AWL	Confer w/ KCM and J. Tapley re mediation strategy.	0.6	\$620.00	\$372.00
7/24/2020	GMO	Communications w/ K. Stadler re case status (0.1); call w/ J. White re case status (0.1); call w/ T. Court re case status (0.1).	0.3	\$355.00	\$106.50
7/27/2020	KCM	Teleconference w/ S. Sanford re mediation issues.	0.8	\$845.00	\$676.00
7/27/2020	KCM	Attend MSGE Group call re mediation issues.	0.6	\$845.00	\$507.00
7/27/2020	AWL	Attend MSGE Group meeting re mediation session.	0.6	\$620.00	\$372.00
7/28/2020	KCM	Teleconference w/ S. Esserman re case status.	0.1	\$845.00	\$84.50
7/28/2020	KCM	Teleconference w/ S. Sanford re case status.	0.1	\$845.00	\$84.50
7/28/2020	KCM	Call w/ AWL, GMO, and MSGE subgroup re upcoming mediation (1.4); confer w/ AWL re case status and tasks (.4).	1.8	\$845.00	\$1,521.00
7/28/2020	AWL	Conference w/ KCM, GMO, and MSGE negotiating group re upcoming mediation session.	1.4	\$620.00	\$868.00
7/28/2020	GMO	Call w/ MSGE subgroup, KCM and AWL re case status.	1.4	\$355.00	\$497.00
7/29/2020	KCM	Teleconference w/ J. Tapley re case status.	0.1	\$845.00	\$84.50
7/29/2020	KCM	Attend MSGE Group call re case update.	0.2	\$845.00	\$169.00
7/29/2020	KCM	Attend insurance presentation to MSGE Group.	1.9	\$845.00	\$1,605.50

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.15 Committee Meetings/Conferences					
7/29/2020	KCM	Teleconferences w/ S. Sanford re mediation issues and case status.	1.3	\$845.00	\$1,098.50
7/29/2020	AWL	Attend MSGE Group case update call.	0.2	\$620.00	\$124.00
7/30/2020	KCM	Call w/ negotiating subcommittee re mediation.	1.2	\$845.00	\$1,014.00
7/30/2020	KCM	Teleconference w/ S. Sanford (.1); call w/ GMO and J. Scolnick re claims (.1).	0.2	\$845.00	\$169.00
7/30/2020	AWL	Confer w/ MSGE negotiating group re mediation strategy.	1.2	\$620.00	\$744.00
7/30/2020	GMO	Call w/ KCM and J. Scolnick re claims (0.1); revise MSGE entities list and correspond w/ members re same (0.7).	0.8	\$355.00	\$284.00
7/31/2020	KCM	Plan/prepare for MSGE presentation.	0.9	\$845.00	\$760.50
7/31/2020	KCM	Teleconference w/ S. Sanford re mediation strategy and next steps.	0.2	\$845.00	\$169.00
Total			36.40		\$24,335.00
.17 Docket Review & File Maintenance					
7/1/2020	BAW	Prepare materials re recent filings (.2); communications re same (.1).	0.3	\$295.00	\$88.50
7/2/2020	BAW	Prepare materials re recent filings (.2); communications re same (.1).	0.3	\$295.00	\$88.50
7/6/2020	BAW	Prepare materials re recent filings (.2); communications re same (.1).	0.3	\$295.00	\$88.50
7/7/2020	BAW	Prepare materials re recent filings (.2); communications re same (.1).	0.3	\$295.00	\$88.50
7/8/2020	BAW	Prepare materials re recent filings (.2); communications re same (.1).	0.3	\$295.00	\$88.50
7/9/2020	BAW	Prepare materials re recent filings (.2); communications re same (.1).	0.3	\$295.00	\$88.50
7/13/2020	BAW	Prepare materials re recent filings (.3); communications re same (.1).	0.4	\$295.00	\$118.00
7/15/2020	BAW	Prepare materials re recent filings (.3); communications re same (.1).	0.4	\$295.00	\$118.00
7/17/2020	BAW	Prepare materials re recent filings (.2); communications re same (.1).	0.3	\$295.00	\$88.50
7/22/2020	BAW	Prepare materials re recent filings (.3); communications re same (.1).	0.4	\$295.00	\$118.00
7/23/2020	BAW	Prepare materials re recent filings (.2); communications re same (.1).	0.3	\$295.00	\$88.50
7/24/2020	BAW	Review dockets and prepare recent filings (.2); communications w/ KCM and GMO re same (.1).	0.3	\$295.00	\$88.50
7/27/2020	BAW	Review dockets and prepare recent filings (.2); communications w/ KCM and GMO re same (.1).	0.3	\$295.00	\$88.50
7/28/2020	BAW	Review dockets and prepare recent filings (.2); communications w/ KCM and GMO re same (.1).	0.3	\$295.00	\$88.50

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.17 Docket Review & File Maintenance					
7/29/2020	BAW	Review dockets and prepare recent filings (.2); communications w/ KCM and GMO re same (.1).	0.3	\$295.00	\$88.50
7/30/2020	BAW	Review dockets and prepare recent filings (.2); prepare and send communications to KCM and GMO re same (.1).	0.3	\$295.00	\$88.50
Total			5.10		\$1,504.50
Total Professional Services			278.9		\$171,164.50

PERSON RECAP

Person		Title	Hours	Rate	Amount
JAL	Jeffrey A. Liesemer	Member	44.0	\$795.00	\$34,980.00
KCM	Kevin C. Maclay	Member	69.4	\$845.00	\$58,643.00
AWL	Ann W. Langley	Of Counsel	72.6	\$620.00	\$45,012.00
GMO	George M. O'Connor	Associate	78.2	\$355.00	\$27,761.00
CG	Cecilia Guerrero	Paralegal	9.6	\$340.00	\$3,264.00
BAW	Brigette A. Wolverton	Paralegal	5.1	\$295.00	\$1,504.50

DISBURSEMENTS

Date	Description of Disbursements	Amount
07/01/2020	Database Research - GMO Westlaw 6/2020 [.11]	\$809.84
07/23/2020	Pacer Charges - BAW 7/1-9/30/20 [.04]	\$477.60
07/23/2020	Conf. Call - CourtSolutions 7/23 hrg (GMO) [.11]	\$70.00
07/23/2020	Conf. Call - CourtSolutions 7/23 hrg (JAL) [.11]	\$70.00
07/23/2020	Conf. Call - CourtSolutions 7/23 hrg (KCM) [.11]	\$70.00
07/28/2020	Filing Fees - Pro hac fee (AWL) [.04]	\$200.00
07/29/2020	Conf. Call - Conference Calls [.11]	\$5.96
07/31/2020	Database Research - JAL Westlaw 7/2020 [.11]	\$1,264.04
07/31/2020	Database Research - GMO Westlaw 7/2020 [.11]	\$660.17
07/31/2020	Database Research - GMO Westlaw 7/2020 [.11]	\$138.83
Total Disbursements		\$3,766.44

Total Services	\$171,164.50
Total Disbursements	\$3,766.44
Total Current Charges	\$174,930.94

TASK RECAP

Services

<u>Category</u>	<u>Hours</u>	<u>Amount</u>
.04	3.00	\$1,020.00
.11	234.40	\$144,305.00
.15	36.40	\$24,335.00
.17	5.10	\$1,504.50
	<u>278.90</u>	<u>\$171,164.50</u>

Disbursements

<u>Category</u>	<u>Amount</u>
.04	\$677.60
.11	\$3,088.84
	<u>\$3,766.44</u>

BREAKDOWN BY PERSON

<u>Person</u>	<u>Category</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
CG Cecilia Guerrero	.04	3.00	\$340.00	\$1,020.00
JAL Jeffrey A. Liesemer	.11	44.00	\$795.00	\$34,980.00
KCM Kevin C. Maclay	.11	49.50	\$845.00	\$41,827.50
AWL Ann W. Langley	.11	66.30	\$620.00	\$41,106.00
GMO George M. O'Connor	.11	68.50	\$355.00	\$24,317.50
CG Cecilia Guerrero	.11	6.10	\$340.00	\$2,074.00
KCM Kevin C. Maclay	.15	19.90	\$845.00	\$16,815.50
AWL Ann W. Langley	.15	6.30	\$620.00	\$3,906.00
GMO George M. O'Connor	.15	9.70	\$355.00	\$3,443.50
CG Cecilia Guerrero	.15	0.50	\$340.00	\$170.00
BAW Brigette A. Wolverton	.17	5.10	\$295.00	\$1,504.50
		<u>278.90</u>		<u>\$171,164.50</u>